

United States District Court

for the

Middle

District of

Pennsylvania

Division

Williamsport

FAMILY OF DIZARD ESTATE
c/o CORRIA DIZARD

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

PENNSYLVANIA DEPARTMENT OF
TRANSPORTATION
Diosdado Arroyo, Director
of
Bureau of Driver Licensing

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

4:24-CV-1705

(to be filled in by the Clerk's Office)

**FILED
WILLIAMSPORT**

OCT 07 2024

PER NR
DEPUTY CLERK

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	FAMILY OF DIZARD ESTATE c/o CORRIA DIZARD
Street Address	1915 east 3rd
City and County	Williamsport, Lycoming
State and Zip Code	Pennsylvania
Telephone Number	570-290-8445
E-mail Address	corriadizard@hotmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional

pages if needed.	
Defendant No. 1	
DEPARTMENT OF TRANSPORTATION	
Name	Diosdado Arroyo
Job or Title <i>(if known)</i>	Director of Bureau of Driver Licensing
Street Address	1101 South Front Street, Third Floor, Riverfront Office Center
City and County	Harrisburg, PA 17104-2516
State and Zip Code	Pennsylvania 17104-2516
Telephone Number	717-412-5300
E-mail Address <i>(if known)</i>	
Defendant No. 2	
Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	
Defendant No. 3	
Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	
Defendant No. 4	
Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	
II. Basis for Jurisdiction Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in	

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WILLIAMSPORT

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PER <u>NR</u>			
b. If the defendant is a corporation DEPUTY CLERK			
(name)	The defendant,		, is incorporated under
(name)	the laws of the State of		, and has its
of (name)	principal place of business in the State		.
(foreign nation)	Or is incorporated under the laws of		,
(name)	and has its principal place of business in		.
<p style="text-align: center;"><i>(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)</i></p> <p>3. The Amount in Controversy</p> <p style="padding-left: 40px;">The amount in controversythe amount the plaintiff claims the defendant owes or the amount at stakeis more than \$75,000, not counting interest and costs of court, because (explain):</p>			
FEE SCHEDULE INCLUDED			
<p>III. Statement of Claim</p> <p>Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.</p>			
A. Where did the events giving rise to your claim(s) occur?			
	As the rightful owner of the trademark, I am entitled to an injunction to prevent further unauthorized use by the Defendants. The continued use of the trademark by the Department of Transportation has led to confusion and conflicts that adversely affect my interests. Therefore, I seek relief in the form of an order requiring the Defendants to immediately cease all use of the trademark "CORRIA DIZARD" and to destroy all materials in their possession that bear the trademark.		
B. What date and approximate time did the events giving rise to your claim(s) occur?			
	The events giving rise to my claims occurred at the Department of Transportation office located at 1101 South Front Street, Third Floor, Riverfront Office Center on May 08, 2024 The Department of Transportation and Disosado Arroyo used my trademark "Coria Dizard" without my permission, which is a violation of my exclusive rights to the name. This unauthorized use has caused me significant harm, including damage to my reputation and the potential loss of rights to my trademark. Defendant was given informal notice on 09/03/2024 via registered mail in which deendant failed to respond/rectify or show cause resulting in a default.		
C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)			

which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

<input checked="" type="checkbox"/>	Federal question	<input type="checkbox"/>	Diversity of citizenship
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Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

	CONSTITUTION OF THE UNITED STATES OF AMERICA ARTICLE 1, SECTION 2, PARAGRAPH 3, AND ARTICLE 1, SECTION 3, PARAGRAPH 3; UNIVERSAL DECLARATION OF HUMAN RIGHTS ARTICLE 15 SECTION 1 AND 2; UNITED NATIONS DECLARATION OF THE RIGHTS OF INDEGENOUS PEOPLE PAGE 3 SECTION 5,6,ND 7; CONSTITUTION OF THE UNITED STATES OF AMERICA ARTICLE 1, SECTION 7, CLAUSE 3
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B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

(name)	The plaintiff,		, is a citizen of the
	State		.
of (name)			

b. If the plaintiff is a corporation

(name)	The plaintiff,		, is incorporated
(name)	under the laws of the State of		,
	and has its principal place of business in the State of (name)		

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

(name)	The defendant,		, is a citizen of
(name)	the State of		. Or is a citizen of
(foreign nation)			.

	<p>The underlying fact of my claim is that the Department of Transportation and its agents have placed negative marks associated with the trademark name "CORRIA DIZARD" on my motor vehicle reports. This has caused ongoing conflicts and confusion with local authorities regarding my inherited rights to travel. The Defendants have utilized my trademark name without authorization while acting as the custodian of my motor vehicle record, which has adversely affected my ability to exercise my rights. As the rightful owner of the trademark, I seek an injunction to prevent further unauthorized use and to have these negative marks removed from my records.</p>
<p>IV. Irreparable Injury</p> <p>Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.</p>	
	<p>Monetary damages at a later time would not adequately compensate me for the injuries I have sustained, am currently sustaining, or will sustain due to the actions of the Department of Transportation and its agents. The negative marks associated with my trademark name "CORRIA DIZARD" have caused ongoing conflicts and confusion with local authorities, which could lead to disruptions in my ability to travel freely. This situation not only affects my personal freedom and reputation but also compromises my peace of mind and safety, as well as that of all parties within the Family of Dizard Estate. The impact of these conflicts is not easily quantifiable in financial terms, as they affect our collective well-being and sense of security. Additionally, the unauthorized use of my trademark has the potential to cause irreparable harm to my brand and identity, which cannot be measured in monetary value. The uncertainty surrounding our rights to travel and the continuous distress caused by these negative marks necessitate immediate injunctive relief, rather than a delayed monetary compensation that fails to address the urgency and seriousness of the situation.</p>
<p>V. Relief</p> <p>State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.</p>	
<p>I request that the court grant the following relief: first, an order requiring the Department of Transportation and its agents to immediately cease all unauthorized use of the trademark name "Coria Dizard" and an order directing the removal of any negative marks associated with my trademark from my motor vehicle records. I claim actual damages based on a fee schedule attached to this complaint, which outlines the specific financial losses incurred as a result of the unauthorized use of my trademark, including damages related to my reputation and ongoing conflicts with local authorities. Additionally, I seek punitive damages based on the same fee schedule due to the Defendants' willful and malicious conduct in using my trademark without authorization. These punitive damages are justified as the Defendants' actions have caused significant distress to the parties within the Family of Dizard Estate, warranting additional compensation to deter similar future conduct. The wrongs alleged are ongoing, as the unauthorized use of my trademark continues to affect our rights and well-being, with negative marks remaining on my records that cause persistent confusion and conflict with local authorities regarding our inherited rights to travel. As the maxim states, "Equity sees that as done what ought to be done," and "Equity aids the vigilant, not those who slumber on their rights." Therefore, I respectfully pray for relief to ensure that justice is served and my rights are upheld.</p>	

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

signing:	Date of	09/23/2024	<i>Corria Dizard</i> <i>grantor, grantee, A.R.R.</i>
Plaintiff	Signature of		
Plaintiff	Printed Name of	FAMILY OF DIZARD ESTATE c/o CORRIA DIZARD	
B. For Attorneys			
signing:	Date of		
Attorney	Signature of		
Attorney	Printed Name of		
	Bar Number		
Firm	Name of Law		
	Street Address		
Code	State and Zip		
Number	Telephone		
	E-mail Address		

Family of Dizard Estate

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C/O CORR IA DIZARD
1915 East 3rd Street
Suite 1002
Williamsport, PA 17701



RF 155 482 628 US

Label 200, August 2008

PSN 753000-0000-0000-0000

Retail



17701

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DEPUTY CLERK

U.S. District Court
Middle District of Pennsylvania
U.S. Court house and Federal office Building
240 West Third Street
Suite 218
Williamsport, Pa 17701